

LLiebeler@LHL-LawFirm.com

6014 Claiborne Drive
McLean, Virginia 22101

3. Name, address, telephone number, fax number and e-mail address of local counsel,

Jackson S. Nichols:

Cohen Seglias Pallas Greenhall & Furman PC
1828 L Street, N.W.
Suite 705
Washington, D.C. 20036
(202) 466-4110
JNichols@CohenSeglias.com

4. Name of Defendants to Case:

Trae Fuels, LLC
Envirotech Services, Inc.

5. Courts to which Lars H. Liebeler, Esquire, is Admitted and Dates of Admission:

District of Columbia: 12/9/1988 (active)
State of California: 12/22/1987 (inactive)
U.S. Supreme Court: 4/17/2001
U.S. Court of Appeals, D.C. Circuit: 12/14/2000
U.S. Court of Appeals, 4th Circuit: 1/7/1997
U.S. Court of Appeals, 3rd Circuit: 8/8/1994
U.S. Court of Appeals, Federal Circuit: 6/23/1998
U.S. District Court, District of Columbia: 1/6/1992
U.S. District Court, District of Maryland: 11/4/1996

6. Lars H. Liebeler, Esquire, is an attorney in good standing and authorized to appear in the Courts identified in paragraph 5. He has conducted numerous jury trials and contested evidentiary hearings in federal court.

7. Lars H. Liebeler, Esquire, is not currently disbarred or suspended in any state, territory, United States possession or tribunal.

8. Lars H. Liebeler, Esquire, is not subject to any pending disciplinary proceeding by any court, agency or organization authorized to discipline him as a lawyer.

9. Lars H. Liebeler, Esquire, has not been disciplined by any court, agency or organization authorized to discipline him as a lawyer.

10. During the last twelve (12) months, Lars H. Liebeler, Esquire, has not sought admission *pro hac vice* under this Rule.

11. Lars H. Liebeler, Esquire, consents to the jurisdiction of the courts and agencies of the Commonwealth of Virginia and the Virginia State Bar, and he further consents to service of process at any address(es) required by this Rule.

12. Lars H. Liebeler, Esquire, agrees to review and comply with the appropriate rules of procedure as required in the case for which he is applying to appear *pro hac vice*.

13. Lars H. Liebeler, Esquire, understands and agrees to comply with the rules and standards of professional conduct required of members of the Virginia State Bar.

14. Pursuant to Local Rule 6(d), I request that Mr. Liebeler be permitted to appear at hearings and/or at trial in this matter without my presence.

15. A draft Order is attached hereto and incorporated herein by reference.

16. The requisite filing fee in support of this motion has been submitted to the Clerk of Court.

17. Counsel of record for Plaintiff, Michael Donaldson, consents to the relief sought in this motion.

WHEREFORE, based upon Lars H. Liebeler's experience and credentials outlined above, it is requested that this Court grant this motion and admit Lars H. Liebeler as counsel for Defendants in this case in association with the undersigned and his firm.

Dated: November 12, 2018

Respectfully submitted,

/s/ Jackson S. Nichols

Jackson S. Nichols, Esq.

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Washington, D.C. 20036

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CERTIFICATE OF SERVICE

This is to certify that I have on November 12, 2018 served all the parties in this case with this **MOTION FOR THE PRO HAC VICE ADMISSION OF LARS H. LIEBELER, ESQUIRE** in accordance with the notice of electronic filing (“ECF”), which was generated as a result of electronic filing in this court.

/s/ Jackson S. Nichols

Jackson S. Nichols, Esq.